

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF SPRINT NEXTEL	:	DOCKET NO. 338
CORPORATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE AND OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY AT	:	
160 WEST STREET, CROMWELL,	:	
CONNECTICUT	:	OCTOBER 18, 2007

POST HEARING BRIEF OF INTERVENOR
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

I. INTRODUCTION

On May 23, 2007, Sprint Nextel Corporation ("Sprint") (the "Applicant") submitted an application ("Application") to the Connecticut Siting Council ("Council") for a certificate of environmental compatibility and public need for the construction, maintenance and operation of an 80-foot telecommunications tower disguised as a flagpole at 160 West Street in Cromwell, Connecticut ("Property"). As proposed, Sprint would install antennas at the 75-foot and 69-foot levels inside the proposed flagpole tower.¹ (Applicant's Exhibit ("App. Exh.") 1).

Cellco Partnership d/b/a Verizon Wireless ("Cellco") evaluated the Applicant's tower proposal and determined that the proposed site could satisfy its objectives for a PCS fill-in site to provide coverage along Routes 9, 372 and 3 in Cromwell. The proposed facility would also provide capacity relief for Cellco's cellular system. (Cellco Exh. 1, Resp. 1). Consequently, on

¹ Sprint reserved the top two antenna locations on the tower for its PCS and iDEN wireless services. (App. Exh. 1, pp. 5-6).

September 11, 2007, Cellco filed a petition to intervene in the Application and hearing process (“Petition”) seeking to share the proposed tower by installing antennas at the 59-foot level inside the flagpole tower.

II. THE CELLCO INSTALLATION

The Cellco installation would consist of three (3) dual-pole, dual-mode antennas with their centerline at the 59-foot level inside the flagpole tower. These antennas would provide both PCS and cellular service to Cellco customers in the area. (Cellco 9, Resp. 3 and 4). Cellco’s equipment would be located in a 12’ x 30’ single-story equipment shelter near the base of the tower. Cellco’s shelter will maintain a brick-like façade to match the existing commercial buildings on the Property. Cellco would also install a back-up generator inside its equipment shelter for use during power outages and periodically for maintenance purposes. (Cellco Exh. 1, Resp. 6; 9/18/07 Hearing Transcript (“Tr.”) pp. 61-62).

A. Cellco’s Need

The Docket No. 338 record contains ample, unrefuted evidence that Cellco antennas at the 59-foot level on the proposed tower would provide quality wireless telecommunications service and satisfy Cellco’s coverage objectives at PCS frequencies in the south-central portion of Cromwell and capacity relief at cellular frequencies. Cellco’s network currently experiences significant PCS coverage gaps in coverage along Routes 9, 372 and 3 as well as local roads in the area.

B. Environmental Impact

The Docket No. 338 record contains ample evidence that the Sprint tower and the installation of Cellco’s antennas at the 59-foot level would not have a substantial adverse environmental effect. (Applicant Exh. 1). Cellco’s equipment shelter would be located on the

ground, near the base of the tower within the proposed facility compound. The potential environmental impacts from Cellco's proposed installation would be minimal when balanced against the benefits to the public.

C. Proposed Tree Tower

During the course of the Docket No. 338 hearing, it was recommended that Sprint consider an alternative stealth (tree) tower design at this site to minimize potential visual impacts the facility may have on adjacent residential areas. (Tr. (evening) p. 8). Sprint was agreeable to this proposed alternative tower design. (Tr. (evening) pp. 8-13).

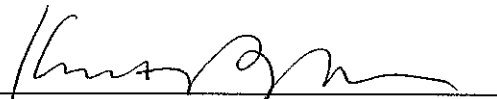
Cellco does not object to the proposed design change and, in fact, supports the change for two principal reasons. First, a tree tower would have a less intrusive impact on adjacent residential areas, and would better blend into the site's environs. Second, and most importantly, the construction of a tree tower will permit the installation of a full array of antennas for both Sprint and Cellco, allowing all of Sprint's antennas to be installed on one level (75 feet AGL), and therefore, Cellco antennas to be installed at the 65-foot level, six feet higher than previously proposed on the flagpole tower. (Tr. (evening) pp. 8-13 and 20).

III. CONCLUSION

The evidence in the Docket No. 338 record supports Cellco's need for the installation of antennas on the proposed tower, preferably at the 65-foot level on a proposed tree tower. Cellco,

therefore, respectfully requests that the Council approve the Application as amended during the course of the hearing and Cellco's shared use of this facility.

Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 
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CERTIFICATION

I hereby certify that on this 18th day of October 2007, a copy of the foregoing was mailed,
postage prepaid, to the following parties and intervenors:

Sprint Nextel Corporation

Thomas J. Regan, Esq.

Brown, Rudnick, Berlack, Israels, LLP

CityPlace I, 38th Floor

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A handwritten signature in black ink, appearing to read 'Kenneth C. Baldwin', is written over a horizontal line.

Kenneth C. Baldwin